

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**14-cv-9126-ALC**

**v.**

**ANTHONY THOMPSON, ET AL.,**

**Defendants,**

**DECLARATION OF MAUREEN PEYTON KING IN SUPPORT  
OF PLAINTIFF'S APPLICATION FOR AN ORDER TO SHOW CAUSE  
WHY DEFENDANT ANTHONY THOMPSON SHOULD NOT  
BE HELD IN CIVIL CONTEMPT**

I, Maureen Peyton King, pursuant to 28 U.S.C. § 1746, do hereby declare as follows:

1. I am a senior trial counsel employed by the Securities and Exchange Commission (the "Commission") in its New York Regional Office. I am a member of the bar of this Court. I am personally familiar with the facts set forth herein.

2. I make this declaration in support of the Commission's application for an order to show cause why Defendant Anthony Thompson ("Thompson") should not be held in civil contempt.

3. The Final Judgment, Docket Entry 154, imposed on Thompson an obligation to pay within 30 days of entry of the Final Judgment, disgorgement of \$624,882.00, representing profits gained as a result of the conduct alleged in the Complaint, together with prejudgment interest thereon in the amount of \$137,381.00, for a total of \$762,263.00.

4. To date, Thompson has made no payments toward the Judgment.

5. The Final Judgment states that: “[t]he Commission may enforce the Court’s judgment for disgorgement and prejudgment interest by moving for civil contempt (and/or through other collection procedures authorized by law) at any time after 30 days following entry of this Final Judgment.” DE 154.

6. Thompson’s pay stub reflects earnings that approximate a \$300,000 annual income. Ex. 3.

7. Thus, for the period from January 2021 through July 2021, Thompson’s Wells Fargo bank statement for account - 1035 should reflect receipts of around \$15,000 (net after taxes of his gross salary of approximately \$25,000 per month) or \$105,000. Yet, Thompson’s bank statements reflect receipts of around \$209,000:

<b>Month</b>	<b>Deposits</b>	<b>Exhibit</b>
Jan-21	\$27,706.67	4
Feb-21	\$20,433.39	5
Mar-21	\$34,808.98	6
Apr-21	\$38,952.13	7
May-21	\$21,396.96	8
Jun-21	\$23,969.13	9
Jul-21	\$41,896.62	10
<b>Total</b>	<b>\$209,163.88</b>	

8. The more than \$104,000 in additional, unexpected receipts is mostly attributable to \$35,000 in transfers from Thompson’s employer, \$51,000 from a third party, Lawrence Secrest, and \$12,000 from UBS.

<b>Date</b>	<b>Payment Reference</b>	<b>Amount Received</b>	<b>Exhibit</b>
12/30/20	Lawrence Secrest	\$9,000	4
1/19/21	Lawrence Secrest	\$7,000	4
1/28/21	Lawrence Secrest	\$15,000	5

<b>Date</b>	<b>Payment Reference</b>	<b>Amount Received</b>	<b>Exhibit</b>
3/1/21	Lawrence Secrest	\$6,000	6
3/5/21	UBS	\$12,000	6
3/18/21	Lawrence Secrest	\$14,000	7
5/18/21	Sugarloaf Equity Partners Inc.	\$10,000	9
6/22/21	Sugarloaf Equity Partners Inc.	\$25,000	10

9. Thompson's bank records reflect expenditures of over \$206,000 for the January through July 2021 statements:

<b>Month</b>	<b>Withdrawals</b>	<b>Exhibit</b>
Jan-21	\$24,546.08	4
Feb-21	\$27,910.49	5
Mar-21	\$33,973.47	6
Apr-21	\$38,458.57	7
May-21	\$16,715.71	8
Jun-21	\$24,174.74	9
Jul-21	\$40,666.57	10
	\$206,445.63	

10. Thompson's January 2017 through July 2021 bank statements show that he has received over \$840,000 into his Wells Fargo account -1035.<sup>1</sup> The sources of these funds include: transfers from Bank of America of around \$150,000 (Ex. A below), TD Ameritrade of around \$50,000 (Ex. B below) and UBS of around \$35,000 (Ex. C below); around \$150,000 in

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<sup>1</sup> Commission counsel derived this total from an electronic analysis of the Wells Fargo bank statements, account -1035, that Mr. Thompson produced. Given the volume of statements involved, Commission counsel can produce pdfs or hard copies of the statements to the Court and Mr. Thompson.

transfers from Lawrence W. Secrest and Kirton McKonie PC (Ex. D below); and over \$70,000 from Quest Ventures LLC (Ex. E below).<sup>2</sup>

11. Thompson resides in a 4 bedroom, 3.5 bath residence in Maryland worth around one million dollars. Ex 2.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Wantagh, New York, on September 23, 2021.

s/Maureen Peyton King  
Maureen Peyton King

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<sup>2</sup> The Commission calculated this amount based on electronic versions of the bank records provided. Summary charts of these records are reflected in the tables below.

**Exhibit A: Bank of American Transfers to Wells Fargo -1035**

<b>Posted Date</b>	<b>Credits</b>	<b>Remarks</b>
10/13/2017	\$10,700.00	WT Fed Bank of America N/Org Anthony J Thompson Srf # 2017101300295835 Trn#099356 Rfb# Lmah9Bu86
12/4/2017	\$11,750.00	WT Fed Bank of America N /Org Tipping Point Ventures LLC Srf # 2017120400327845 Trn#088009 Rfb# Rg3Jltq35
2/1/2018	\$10,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2018020100337560 Trn#108837 Rfb# E87Txhswq
6/12/2018	\$10,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2018061200298893 Trn#090852 Rfb# T4Nwnqlwr
9/19/2018	\$4,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2018091900290999 Trn#078900 Rfb# XXXXXXXXXXXX9406
11/7/2018	\$5,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2018110700049251 Trn#013149 Rfb# XXXXXXXXXXXX5298
12/17/2018	\$1,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2018121700075669 Trn#019561 Rfb# XXXXXXXXXXXX8784

<b>Posted Date</b>	<b>Credits</b>	<b>Remarks</b>
1/14/2019	\$2,200.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2019011400068166 Trn#017824 Rfb# XXXXXXXXXXXX7768
7/12/2019	\$5,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2019071200272444 Trn#057962 Rfb# XXXXXXXXXXXX3012
7/16/2019	\$3,000.00	WT Fed Bank of America N/Org Anthony J Thompson Srf # 2019071600411433 Trn#129933 Rfb# XXXXXXXXXXXX0726
7/17/2019	\$2,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2019071700401719 Trn#135880 Rfb# XXXXXXXXXXXX2522
8/9/2019	\$3,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2019080900379420 Trn#123301 Rfb# XXXXXXXXXXXXI 36

<b>Posted Date</b>	<b>Credits</b>	<b>Remarks</b>
8/15/2019	\$2,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2019081500376267 Trn#143031 Rfb# XXXXXXXXXXXX4640
9/16/2019	\$2,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2019091600060802 Trn#017632 Rfb# XXXXXXXXXXXX8210
9/18/2019	\$2,500.00	WT Fed Bank of America N/Org Anthony J Thompson Srf # 2019091800344922 Trn#090171 Rfb# XXXXXXXXXXXX9606
10/21/2019	\$2,500.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2019102100338083 Trn#076905 Rfb# XXXXXXXXXXXX3702
11/1/2019	\$4,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2019110100271978 Trn#046072 Rfb# XXXXXXXXXXXX8920
11/7/2019	\$9,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2019110700377443 Trn#109068 Rfb# XXXXXXXXXXXX6352

<b>Posted Date</b>	<b>Credits</b>	<b>Remarks</b>
11/27/2019	\$7,500.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2019112700431557 Trn#071356 Rfb# XXXXXXXXXXXX1612
12/17/2019	\$500.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2019121700525370 Trn#102347 Rfb# XXXXXXXXXXXX5214
1/3/2020	\$6,500.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020010300433690 Trn#072227 Rfb# XXXXXXXXXXXX4832
1/14/2020	\$2,100.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020011400566180 Trn#130263 Rfb# XXXXXXXXXXXX6622
1/30/2020	\$2,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020013000547404 Trn#130742 Rfb# XXXXXXXXXXXX1106



<b>Posted Date</b>	<b>Credits</b>	<b>Remarks</b>
2/3/2020	\$1,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020020300631885 Trn#145255 Rfb# XXXXXXXXXXXX8050
2/7/2020	\$500.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020020700482880 Trn#113632 Rfb# XXXXXXXXXXXX2432
2/12/2020	\$2,500.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020021200042722 Trn#011870 Rfb# XXXXXXXXXXXX4976
2/21/2020	\$3,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020022000673542 Trn#014966 Rfb# XXXXXXXXXXXX2036
2/27/2020	\$4,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020022700669989 Trn#153571 Rfb# XXXXXXXXXXXX5898
3/13/2020	\$5,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020031300665712 Trn#192858 Rfb# XXXXXXXXXXXX1434

<b>Posted Date</b>	<b>Credits</b>	<b>Remarks</b>
3/30/2020	\$5,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020033000552807 Trn#121850 Rfb# XXXXXXXXXXXXX9182
5/1/2020	\$5,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020050100271920 Trn#071766 Rfb# XXXXXXXXXXXXX5770
5/14/2020	\$3,500.00	WT Fed Bank of America N/Org Anthony J Thompson Srf # 2020051300586851 Trn#012552 Rfb# XXXXXXXXXXXXX2636
5/22/2020	\$1,000.00	WT Fed Bank of America N/Org Anthony J Thompson Srf # 2020052200515390 Trn#120581 Rfb# XXXXXXXXXXXXX4956
6/1/2020	\$4,600.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020060100576578 Trn#136249 Rfb# XXXXXXXXXXXXX4008

<b>Posted Date</b>	<b>Credits</b>	<b>Remarks</b>
6/9/2020	\$2,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020060900516139 Trn#120628 Rfb# XXXXXXXXXXXX2274
6/18/2020	\$1,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020061800403875 Trn#073722 Rfb# XXXXXXXXXXXX2172
11/23/2020	\$1,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020112300760484 Trn#237239 Rfb# XXXXXXXXXXXX0896
11/23/2020	\$1,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020112300761460 Trn#237758 Rfb# XXXXXXXXXXXX1160
11/23/2020	\$1,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020112300761855 Trn#237976 Rfb# XXXXXXXXXXXX1300

<b>Posted Date</b>	<b>Credits</b>	<b>Remarks</b>
11/23/2020	\$1,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020112300762188 Trn#238223 Rfb# XXXXXXXXXXXX1404
11/23/2020	\$1,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020112300762651 Trn#238437 Rfb# XXXXXXXXXXXX1514
11/23/2020	\$1,000.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020112300763124 Trn#238821 Rfb# XXXXXXXXXXXX1654
11/24/2020	\$850.00	WT Fed Bank of America N /Org Anthony J Thompson Srf # 2020112400325149 Trn#039555 Rfb# XXXXXXXXXXXX5054
<b>Total</b>	<b>\$153,200.00</b>	

**Exhibit B: Transfers from TD Ameritrade to Account -1035**

<b>Posted Date</b>	<b>Credits</b>	<b>Remarks</b>
7/27/2020	\$2,200.00	WT Seq Td Ameritrade Clearing /Org Anthony J Thompson Srf # Ec20072785486470 Trn#120948 Rfb# 21031366
7/29/2020	\$5,450.00	WT Seq Td Ameritrade Clearing /Org Anthony J Thompson Srf # Ec20072957034674 Trn#051742 Rfb# 21040721
8/12/2020	\$1,320.00	WT Seq Td Ameritrade Clearing /Org Anthony J Thompson Srf # Ec20081266636253 Trn#111136 Rfb# 21111207
8/21/2020	\$8,000.00	WT Seq Td Ameritrade Clearing /Org Anthony J Thompson Srf # Ec20082157132521 Trn#085032 Rfb# 21152709
8/31/2020	\$5,570.00	WT Seq Td Ameritrade Clearing /Org Anthony J Thompson Srf # Ec20083109783217 Trn#168210 Rfb# 21192084
9/21/2020	\$1,100.00	WT Seq Td Ameritrade Clearing /Org Anthony J Thompson Srf # Ec20092157262651 Trn#087031 Rfb# 21290042
9/25/2020	\$1,500.00	WT Seq Td Ameritrade Clearing /Org Anthony J Thompson Srf # Ec20092599571604 Trn#160029 Rfb
9/30/2020	\$7,500.00	WT Seq Td Ameritrade Clearing /Org Anthony J Thompson Srf # Ec20093066853093 Trn#198341 Rfb# 21333225
10/23/2020	\$1,850.00	WT Seq Td Ameritrade Clearing /Org Anthony J Thompson Srf # Ec20102385586697 Trn#075797 Rfb# 21447898

10/27/2020	\$8,100.00	WT Seq Td Ameritrade Clearing /Org Anthony J Thompson Srf # Ec20102778619852 Trn#133651 Rfb# 21462286
12/3/2020	\$1,575.00	WT Seq Td Ameritrade Clearing /Org Anthony J Thompson Srf # Ec20120320149424 Trn#063359 Rfb# 21659384
12/11/2020	\$2,900.00	WT Seq Td Ameritrade Clearing /Org Anthony J Thompson Srf # Ec20121100252561 Trn#046608 Rfb
12/14/2020	\$3,000.00	WT Seq Td Ameritrade Clearing /Org Anthony J Thompson Srf # Ec20121400261114 Trn#095971 Rfb# 21725831
<b>Total</b>	<b>\$50,065.00</b>	

**Exhibit C: Transfers from UBS to Account -1035**

<b>Posted Date</b>	<b>Credits</b>	<b>Remarks</b>
1/11/2018	\$23,000.00	Ubs Finsvc Dps ACH XXXXXXXXXXXX9440 Anthony J Thompson Jr
3/5/2021	\$12,000.00	Ubs Finsvc Dps ACH XXXXXXXXXXXX5550 Anthony J Thompson Jr
<b>Total</b>	<b>\$35,000.00</b>	

**Exhibit D: Transfers from Secrest and McConkie**

<b>Posted Date</b>	<b>Credits</b>	<b>Remarks</b>
6/25/2020	\$102,650.00	WT Fed Zions Bancorporati /Org Kirton McConkie PC Srf # 2020062500005282 Trn#155052 Rfb# 52482633
12/30/2020	\$9,000.00	WT Fed Pnc Bank N A /Org Lawrence W Secrest Srf 20Cuj0829lq261 Kr Trn#192256 Rfb# 20Cuj0829lq261Kr
1/19/2021	\$7,000.00	WT Fed Pnc Bank N A /Org Lawrence W Secrest Srf 211 Ji564856J9Q8l Trn#227552 Rfb# 211Ji564856J9Q8l
1/28/2021	\$15,000.00	WT Fed Pnc Bank N A /Org Lawrence W Secrest Srf 211 Sf2739Cqw12Ss Trn#087280 Rfb# 211Sf2739Cqw12Ss
3/1/2021	\$6,000.00	WT Fed Pnc Bank N A /Org Lawrence W Secrest Srf 2131L0021 Bgs2lsp Trn#262418 Rfb# 2131L0021 Bgs2lsp
3/18/2021	\$14,000.00	WT Fed Pnc Bank N A /Org Lawrence W Secrest Srf 213lg2642Nue7Ced Trn#114389 Rfb# 213lg2642Nue7Ced
<b>Total</b>	<b>\$153,650</b>	



**Exhibit E: Transfers from Quest**

<b>Posted Date</b>	<b>Credits</b>	<b>Remarks</b>
3/8/2018	\$2,500.00	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 180308150024H101 Trn#121938 Rfb
3/22/2018	\$5,000.00	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 180322090205H100 Trn#036472 Rfb
4/6/2018	\$21,582.14	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 180406150037H100 Trn#125049 Rfb
5/17/2018	\$2,952.00	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 180517153036H100 Trn#129172 Rfb
6/5/2018	\$1,063.00	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 180605100035H100 Trn#047671 Rfb
6/11/2018	\$645.00	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 180611163041H100 Trn#154854 Rfb
6/20/2018	\$2,955.60	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 180620150049H100 Trn#131082 Rfb
7/12/2018	\$1,758.62	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 180712123015H100 Trn#088194 Rfb
7/23/2018	\$15,000.00	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 180723130021H100 Trn#107751 Rfb

8/2/2018	\$2,355.78	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 180802113046H100 Trn#071584 Rfb
8/13/2018	\$897.92	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 180813163047H100 Trn#155116 Rfb
8/16/2018	\$1,100.00	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 180816123031H100 Trn#084694 Rfb
8/22/2018	\$3,500.00	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 180822133052H100 Trn#092772 Rfb
9/7/2018	\$1,709.05	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 180907160128H100 Trn#148192 Rfb
9/18/2018	\$2,599.11	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 180918170322H100 Trn#149318 Rfb
9/27/2018	\$1,407.93	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 180927100024H100 Trn#058105 Rfb
10/5/2018	\$1,054.67	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 181005103018H100 Trn#057494 Rfb
10/12/2018	\$2,613.68	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 181012160058H100 Trn#151690 Rfb
10/19/2018	\$2,347.35	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLC Srf # 181019150107H100 Trn#125419 Rfb

10/25/2018	\$675.00	WT Fed Td Bank NA /Org Quest Entertainment Ventures LLCSrf# 181025143013H100 Trn#117719 Rfb
<b>Total</b>	<b>\$73,716.85</b>	